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Attorneys for Defendant State Farm Mutual
Automobile Insurance Company

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

SHERRI TURNER,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

Case No. 3:20-cv-00059-TMB

NOTICE OF REMOVAL

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

This notice of defendant State Farm Mutual Automobile Insurance Company respectfully shows:

1. That on the 27th day of September, 2019, an action was commenced in the Superior Court for the State of Alaska at Palmer, entitled *Sherri Turner v. State Farm Mutual Automobile Insurance Company*, Case No. 3PA-19-02292 Civil. Plaintiff's complaint asserts a claim for breach of the covenant of good faith and fair dealing ("bad

faith”) in addition to a claim for recovery of the available underinsured motorist benefits under a State Farm insurance policy, and seeks compensatory and punitive damages in an amount in excess of \$100,000. Therefore, the amount in controversy is more than \$75,000, exclusive of interest, costs and fees.

2. That this notice of removal is being filed pursuant to Title 28, United States Code § 1446(a) and (b) within thirty (30) days after receipt by defendant State Farm Mutual Automobile Insurance Company of the Summons and Complaint in the above-referenced action. Service of the Summons was accomplished on or about February 18, 2020.

3. This court has original jurisdiction of this action pursuant to Title 28, U.S.C. Section 1332(a), and this action may be removed to United States District Court pursuant to Title 28, U.S.C. Section 1441 and Section 1446(b), in that it is a civil action, the sum in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the parties to this lawsuit.

4. On information and belief, at the time this action was commenced, Plaintiff was a resident of Alaska as alleged in the Complaint.

5. At the time this action was commenced, defendant State Farm Mutual Automobile Insurance Company was, and is, a mutual insurance company organized under the laws of the State of Illinois, with its principal place of business in Bloomington, Illinois.

6. Defendant State Farm Mutual Automobile Insurance Company will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE defendant State Farm Mutual Automobile Insurance Company gives notice that this action formerly pending in the Superior Court for the State of Alaska, Third Judicial District at Palmer is hereby removed to this court.

DATED at Anchorage, Alaska, this 9th day of March, 2020.

HUGHES WHITE COLBO
WILCOX & TERVOOREN, LLC,
Attorneys for Defendant State Farm
Mutual Automobile Insurance Company

By: s/Kimberlee A. Colbo
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I hereby certify that a true and correct
copy of the foregoing was ☐ faxed
☐ hand delivered and/or ☒ mailed
this 9th day of March, 2020 to:

Curtis Martin
Law Offices of Curtis W. Martin
263 S. Alaska Street
Palmer, AK 99645

...s/Kimberlee A Colbo
Kimberlee A. Colbo